

UNITED STATES DISTRICT COURT  
 DISTRICT OF OREGON  
 PORTLAND DIVISION

LEUPOLD & STEVENS, INC.,

Plaintiff / Counterclaim-Defendant,

v.

LIGHTFORCE USA, INC. d/b/a  
 NIGHTFORCE OPTICS and  
 NIGHTFORCE USA.

Defendant / Counterclaimant.

No. 3:16-cv-1570-HZ

**JOINT REPORT AND STIPULATION  
 TO DATES**

Pursuant to the Court's case management conference and rulings (Dkt # 74) on March 20, 2018, Plaintiff Leupold & Stevens, Inc. and Defendant Lightforce USA, Inc. d/b/a Nightforce Optics and Nightforce USA ("Lightforce"), by and through counsel of record, present this joint report setting forth the dates set by the Court and other intermediate deadlines stipulated to by the parties.

The parties submit this joint filing for ease of future reference on the Court docket.

<u>Event</u>	<u>Deadline</u>
Deadline to complete document productions (other than routine supplementation and/or newly discovered evidence, or evidence newly produced by a 3 <sup>rd</sup> party).	4/16/2018
Deadline for Counsel to Confer re Method and Timing of ADR Procedures and File Joint ADR Report	4/2/2018 (Dkt # 74)
Disclosure of Reliance Upon Advice of Counsel Defense	4/2/2018
Deadline to amend pleadings or add parties	4/20/2018

	(Dkt # 74)
Respond to all interrogatories, and requests for admission	5/25/2018
Date to complete fact depositions	7/6/2018
Deadline for fact discovery motions (if any)	7/13/2018
Opening expert reports as required by Fed. R. Civ. P. 26(a)(2)(A)-(C)	7/20/2018
Rebuttal expert reports as required by Fed. R. Civ. P. 26(a)(2)(D)(ii)	8/24/2018
Close of expert discovery	9/14/2018 (Dkt # 74)
Deadline to file dispositive motions	10/5/2018 (Dkt # 74)
ADR Deadline	11/16/2018
Summary Judgment Oral Arguments	12/17/2018 at 1:30 pm (Dkt # 74)
Deadline to file motions to exclude or limit expert testimony under <i>Daubert</i> or FRE 702-703	1/7/2019
Plaintiff to serve proposed pretrial order, jury instructions and verdict form	2/4/2019
Defendant to serve objections and counterproposals for proposed pretrial order, jury instructions and verdict form	2/15/2019
1st Wave of Pre-Trial Filings (exhibits and exhibit lists; lay and expert witness statements; itemized list of economic damages; deposition designations; trial briefs)	2/25/2019
2d Wave of Pre-Trial Filings (motions in limine; voir dire questions; jury instructions; verdict form; objections to witnesses; rebuttal witnesses/exhibits lists)	3/8/2019
3d Wave of Pre-Trial Filings (one-page list of all potential witnesses; rebuttal witness statements, deposition designations and exhibits; responses to motions in limine; objections to exhibits; objections to witnesses)	3/18/2019
Final Wave of Pre-Trial Filings (lodge proposed pretrial order, joint motion in limine ruling chart; joint witness and exhibit ruling chart; objections to rebuttal witness	3/29/2019

statements, deposition designations and exhibits)	
Final Pre-Trial Conference	April 8, 2019 at 9:00 am (Dkt # 74)
TRIAL	April 16, 2019 at 9:00 am (15 trial days) (Dkt # 74)

DATED this 21st day of March, 2018.

Respectfully submitted,

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